

**"UNDER SEAL"**

FILED  
CHARLOTTE, NC

JUL 18 2023

US DISTRICT COURT  
WESTERN DISTRICT OF NC

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION

UNITED STATES OF AMERICA	)	DOCKET NO. 3:23-cr-157-KDB
	)	
v.	)	<b><u>BILL OF INDICTMENT</u></b>
	)	
	)	Violations:
JAKIA McMORRIS	)	18 U.S.C. § 1349
a/k/a "Kiki"	)	18 U.S.C. § 1956(h)
	)	
	)	

**THE GRAND JURY CHARGES:**

At the specified times and at all relevant times:

**Introduction**

1. Beginning in at least September 2022, Defendant JAKIA McMORRIS, also known as "Kiki," conspired with others, known and unknown to the Grand Jury, to defraud financial institutions by depositing stolen and fraudulent checks into bank accounts and withdrawing the funds before the fraud could be detected. The total of the checks deposited into accounts associated with the conspiracy exceeds \$40,000.

**Background**

2. McMORRIS was a resident of Charlotte, North Carolina and was an employee of the U.S. Postal Service (USPS). Beginning in approximately May 2021, McMORRIS was a city carrier at the North Tryon Station in Charlotte, North Carolina.

3. McMORRIS maintained three accounts at Bank of America, specifically a checking account opened in 2009 (BOA \*9465), a checking account opened on September 15, 2022 (BOA \*0082), and a savings account opened in 2016 (BOA \*7175).

4. On or about September 13, 2022, McMORRIS reported that she had lost a USPS universal key, known as an arrow key, while delivering mail that day. Subsequent to September 13, 2022, McMORRIS stopped reporting for work at the USPS.

5. Co-conspirator A was a resident of Charlotte, North Carolina.

### **The Bank Fraud Conspiracy**

6. Beginning in at least September 2022, McMORRIS, and others known and unknown to the Grand Jury, conspired to obtain money and funds under the custody and control of financial institutions and stole more than \$40,000 in checks, including from the U.S. mail. As part of the conspiracy, co-conspirators deposited fraudulent and stolen checks into other bank accounts and then quickly withdrew the funds before the fraud was detected.

7. Co-conspirators, known and unknown to the Grand Jury, stole business checks from the U.S. mail. On some occasions, co-conspirators, known and unknown to the Grand Jury, obtained USPS universal keys and used those keys to open multi-unit outdoor mailboxes in office parks in and around Charlotte, North Carolina to steal business checks.

a. For example, in or about October 2022, co-conspirators, known and unknown to the Grand Jury, used a USPS universal key to steal checks, including business checks, from a multi-unit outdoor mailbox for an office park in Charlotte, North Carolina. These checks included checks written on the account of a victim business, "Company SSB."

8. Co-conspirators, known and unknown to the Grand Jury, opened new bank accounts and gained access to previously opened bank accounts at financial institutions, the deposits of which were insured by the Federal Deposit Insurance Corporation (FDIC) ("Victim Financial Institutions"), including in the names of McMORRIS and Co-Conspirator A. Other co-conspirators, known and unknown to the Grand Jury, deposited fraudulent checks and checks stolen from the U.S. mail into these accounts and withdrew the funds as cash.

9. In or around October 2022, approximately 17 checks totaling \$32,088.23 that were fraudulent, including checks that were stolen from the U.S. mail were deposited into Bank of America accounts controlled by McMORRIS. Specifically, on or about the dates described below, McMORRIS and co-conspirators, known and unknown to the Grand Jury, deposited stolen checks as described below:

	<b>Deposit Date</b>	<b>Description of Check</b>	<b>McMORRIS Account #</b>	<b>Amount</b>
a.	10/6/2022	Check from Company SIBMS to Company CP dated 9/29/2022	BOA *9465	\$7,831.49
b.	10/11/2022	Check from Company FTMC to Company O dated 8/5/2022	BOA *9465	\$2,751.60
c.	10/12/2022	Check from Company SKPB to Company CAS dated 8/3/2022	BOA *9465	\$2,012.05
d.	10/12/2022	Check from Company DC to Individual HL dated 9/9/2022	BOA *9465	\$1,763.93

	<b>Deposit Date</b>	<b>Description of Check</b>	<b>McMORRIS Account #</b>	<b>Amount</b>
e.	10/14/2022	Check from Company RFC to Individual DC dated 10/3/2022	BOA *0082	\$2,100.00
f.	10/14/2022	Check from Company EL to Company GI dated 9/10/2022	BOA *0082	\$1,651.80
g.	10/20/2022	Check from Company SSB to Company GADA dated 10/11/2022	BOA *0082	\$2,195.00
h.	10/20/2022	Check from Company DD to Company DHC dated 10/1/2022	BOA *0082	\$1,846.25
i.	10/26/2022	Check from Company GS to Company IGB dated 9/27/2022	BOA *9465	\$3,359.33
j.	10/27/2022	Check from Company FRHI to Company MAM dated 9/10/2022	BOA *0082	\$605.00
k.	10/27/2022	Check from Company LOCM to Company SCM dated 4/5/2022	BOA *0082	\$800.00
l.	10/28/2022	Check from Company FRHI to Company MAM dated 9/10/2022	BOA *0082	\$990.00
m.	10/28/2022	Check from Company UCCS to Company GCAD dated 10/11/2022	BOA *0082	\$550.00
n.	10/28/2022	Check from Company SJLC to Company EJHS dated 9/14/2022	BOA *0082	\$450.00
o.	10/28/2022	Check from Company RCY to GCAD dated 10/13/2022	BOA *0082	\$1,100.00
p.	10/28/2022	Check from Company BCN to Company AAS dated 10/11/2022	BOA *0082	\$1,521.78
q.	10/28/2022	Check from Company LSA to Company ATD dated 8/30/2022	BOA *0082	\$560.00
<b>Total</b>				<b>\$32,088.23</b>

10. Additionally, as part of the conspiracy, stolen and fraudulent checks totaling nearly \$10,000 were deposited into Co-Conspirator A's bank account between November 1, 2022 and November 8, 2022.

11. Other co-conspirators, known and unknown to the Grand Jury, made payments to McMORRIS and Co-Conspirator A for the use of their bank accounts during the conspiracy.

12. As part of the conspiracy, in an attempt to conceal and disguise the source of the payments made to McMORRIS, co-conspirators used some of the fraudulent proceeds in McMORRIS's bank account to purchase money orders, which McMORRIS then deposited into bank accounts under her control.

a. For example, on or about October 20, 2022, McMORRIS and certain of her co-conspirators used and caused to be used a debit card associated with BOA \*0082

to purchase six Western Union money orders totaling \$3,000 in Matthews, North Carolina. On or about October 26, 2022, McMORRIS deposited three of these money orders were had been subsequently written to her as the payee into her BOA \*9645 account.

**COUNT ONE**

(Conspiracy to Commit Bank Fraud – 18 U.S.C. § 1349)

13. The Grand Jury realleges and incorporates by reference herein all of the allegations contained in paragraphs 1 through 12 of the Bill of Indictment, and further alleges that:

14. From in or about September 2022 to the date of this Bill of Indictment, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, the defendant,

**JAKIA McMORRIS,**

did knowingly and willfully combine, conspire, confederate, and agree with others known and unknown to the Grand Jury, to engage in a scheme and artifice to obtain money, funds, or credits under the custody and control of financial institutions, by means of materially false and fraudulent pretenses, representations and promises, to wit, bank fraud, in violation of Title 18, United States Code, Section 1344(2).

**Object of the Conspiracy**

15. *Bank Fraud:* It was a part and an object of the conspiracy that McMORRIS and her co-conspirators, would and did execute and attempt to execute, the above-described scheme and artifice to obtain moneys owned by, or in the custody or control of, one or more of the Victim Financial Institutions, by means of materially false and fraudulent pretenses, representations, and promises in violation of Title 18, United States Code, Section 1344(2).

**Manner and Means**

16. McMORRIS and her co-conspirators carried out the conspiracy in the manner and means as set forth in paragraphs 6 through 12 above, among others.

All in violation of Title 18, United States Code, Section 1349.

**COUNT TWO**  
**(Money Laundering Conspiracy - 18 U.S.C. § 1956(h))**

17. The Grand Jury realleges and incorporates by reference herein all of the allegations contained in paragraphs 1 through 12 of the Bill of Indictment, and further alleges that:

18. From in or around September 2022 through at least in or around November 2022, in Mecklenburg County, within the Western District of North Carolina and elsewhere, the defendant,

**JAKIA McMORRIS,**

did knowingly combine, conspire, confederate, and agree with others known and unknown to the Grand Jury, to commit money laundering offenses in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

**Object of the Conspiracy**

19. It was a part and an object of the conspiracy that Defendant and other co-conspirators, would and did knowingly conduct and attempt to conduct financial transactions affecting interstate commerce, which transactions involved the proceeds of a specified unlawful activity, namely bank fraud and bank fraud conspiracy, and that while conducting and attempting to conduct such financial transactions knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, with the intent to conceal and disguise in whole and in part the nature, location, source, ownership, and control of the proceeds of a specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

**Manner and Means**

20. McMORRIS and her co-conspirators carried out the conspiracy in the manner and means as set forth in paragraphs 6 through 12 above, among others.

All in violation of Title 18, United States Code, Section 1956(h).

**NOTICE OF FORFEITURE AND FINDING OF PROBABLE CAUSE**

Notice is hereby given of 18 U.S.C. § 982 and 28 U.S.C. § 2461(c). Under Section 2461(c), criminal forfeiture is applicable to any offenses for which forfeiture is authorized by any other statute, including but not limited to 18 U.S.C. § 981 and all specified unlawful activities listed or referenced in 18 U.S.C. § 1956(c)(7), which are incorporated as to proceeds by Section 981(a)(1)(C). The following property is subject to forfeiture in accordance with Section 982 and/or 2461(c):

- a. All property which constitutes or is derived from proceeds of the violations set forth in this Bill of Indictment;
- b. All property involved in the violations; and
- c. If, as set forth in 21 U.S.C. § 853(p), any property described in (a) or (b) cannot be located upon the exercise of due diligence, has been transferred or sold to, or deposited with, a third party, has been placed beyond the jurisdiction of the court, has been substantially diminished in value, or has been commingled with other property which cannot be divided without difficulty, all other property of the defendant/s to the extent of the value of the property described in (a) and (b).

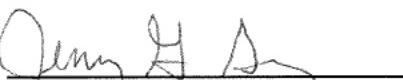
The Grand Jury finds probable cause to believe that the following property is subject to forfeiture on one or more of the grounds stated above:

- a. A forfeiture money judgment in the amount of at least \$32,088.23, such amount constituting the proceeds of the violations set forth in this Bill of Indictment;

A TRUE BILL:

[REDACTED]  
FOREPERSON

DENA J. KING  
UNITED STATES ATTORNEY

  
JENNY GRUS SUGAR  
ASSISTANT UNITED STATES ATTORNEY